# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.<sup>1</sup>

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA Title III

No. 17-BK-3283-LTS

(Jointly Administered)

PROMESA Title III

No. 17-BK-4780-LTS

<sup>&</sup>lt;sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

PARTIAL JOINDER OF ASSURED GUARANTY CORP. AND ASSURED GUARANTY MUNICIPAL CORP. TO THE RELIEF REQUESTED IN THE SUPPLEMENTAL OBJECTIONS OF THE AD HOC GROUP OF PREPA BONDHOLDERS TO THE DISCLOSURE STATEMENT FOR THE FIRST AMENDED TITLE III PLAN OF ADJUSTMENT OF THE PUERTO RICO ELECTRIC POWER AUTHORITY [ECF NO. 3225]

Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (together, "<u>Assured</u>") hereby respectfully submit this partial joinder (the "<u>Joinder</u>") to the substantive arguments raised in the *Supplemental Objections of the Ad Hoc Group of PREPA Bondholders to the Disclosure Statement for the First Amended Title III Plan of Adjustment of the Puerto Rico Electric Power Authority* [ECF No. 3225] (the "<u>Supplemental Objection</u>").<sup>2</sup> Assured respectfully states as follows:

- 1. Assured hereby joins in and incorporates by reference the arguments set forth in Parts II and III of the Supplemental Objection. Assured agrees with the Ad Hoc Group's arguments that the Feb. 9 DS does not provide adequate information and that the First Amended Plan is patently unconfirmable.
- 2. Assured otherwise reserves all of its rights with respect to the Feb 9 DS, the First Amended Title III Plan, the Supplemental Objection and any related filings.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used in this Joinder, but not defined herein, shall have the meanings ascribed to them in the Supplemental Objection.

Dated: New York, New York February 17, 2023

# CASELLAS ALCOVER & BURGOS P.S.C.

### By: <u>/s/ Heriberto Burgos Perez</u>

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### **CERTIFICATE OF SERVICE**

I hereby certify that I filed this document electronically with the Clerk of the Court for the United States District Court for the District of Puerto Rico by using the CM/ECF system, which will send notification of such filing to all parties of record in the captioned case.

At New York, New York, the 17th day of February, 2023.

By: /s/ Howard R. Hawkins, Jr.

Howard R. Hawkins, Jr.\*

\* admitted pro hac vice